

**DEP Response Document**  
**40-328-006 for UGI Development**

Response to August 4, 2009 Response

1. Assuming the electricity or steam from Units 1-3 and Unit 4 is not sent to a common source, these Units do appear to be separate facilities under Title V.
2. While this does clarify our previous question, the NSPS includes no exemption for startup, shutdown, or malfunction and, requires good air pollution control practices for minimizing emissions at all times including during startup, shutdown, and malfunction (40CFR 60.4333). Thus, condition #007 for Section E, source Group 1 should be removed.

Although the NSPS does not include any exemption for startup, shutdown, or malfunction the facility can not operate the turbine in such a way to meet the emission limitations during these situations. Therefore the Department has set operation limitations to the turbine during startup, shutdown under 25 PA Code 127.12b. Additionally in the event there is a malfunction the Permittee shall notify the Department of the malfunction and the corrective action taken to resolve the malfunction. The Permittee is also required to include the emissions during these times in the 12 month rolling sum emission limits described in Section C of the permit.

3. Response is considered complete.
4. Response is correct, our comments were incorrect.
5. The revised table answers our question.
6. Information provided for question #3 answers our question.
7. Response is accepted. Subpart YYYY should be included in the Permit Review Memo with a similar explanation as to why it does not currently apply.

Additional Comments

Permit Review Memo

Page 9 - Par 3, it appears that "Unit #6" in this paragraph should be replaced with "Unit #3."

The Department has changed Par 3 to read Unit #3.

NSPS Subpart Kb – No reference to this requirement is included in the Review Memo, yet the permit includes numerous Kb requirements. Is Subpart Kb actually applicable? If so, the Permit Review memo should discuss it and why it applies. If not, the requirements that are listed in the permit should be removed.

The proposed equipment at UGI includes a 500,000 Gallon Distillate Tank and is subject to Subpart Kb of NSPS. The review memo has been revised to include the requirements of NSPS Subpart Kb.

#### Proposed Plan

1. VE testing - The Proposed Plan lists two different and inconsistent opacity measuring limits; See Section C Condition #014 and Section E, Source Group 1, Condition #003.

Section C- #14 pertains to Monitoring Methods for VE

Section C - #4 pertains to VE emission limit for the Site

Section E- Group#1 - #3 pertains to source specific emission limit for VE

2. Recordkeeping – How are the records of monthly emissions listed in Section C, Condition #019 to be generated? NSPS KKKK monitoring and recordkeeping requirements only cover NO<sub>x</sub> and SO<sub>2</sub>.

The facility is to use emission data from CEM and test data to calculate emissions on a monthly basis.

3. General Permit – Section D, 49.9 MM BTU/Hr Boiler – Specific citations for the General Permit should be included for each applicable requirement listed in this Section. Inapplicable parts of the General Permit should not be included, such as:
  - a. Condition #001, par 3 references to permits other than Title V,
  - b. Condition #002 last sentence, and
  - c. Condition #013 in entirety.

Condition #003 is a Recordkeeping/Reporting Requirement and should be moved to one or both of those sections

Condition #006 refers to Condition #017 for each boiler. Where is this condition?

The Department has revised this section of the permit to remove all references to the General Permit and any reference to fuels other than natural gas.

4. Section D, 500,000 gal distillate fuel tank - Even if NSPS Subpart Kb applies, Condition #006 should be deleted as it is not a permit condition.

The Department has removed condition # 6 from this source.

5. Section E, Source Group Combustion Turbines w HRSG, Condition #015 – Please identify the units to which this condition applies.

The Department removed this condition from the permit as it does not apply to this facility

6. Section E, Subpart KKKK Turbine NSPS - Inapplicable parts of this NSPS should be removed. For example:
  - a. Condition #001 – last three paragraphs
  - b. Condition #003 – two paragraphs that apply to turbines with NOx standard >15ppm

Condition #002 should be moved to the Monitoring Section.

Condition #008, last paragraph (b) – Please identify which units may be covered.

The Department has removed the inapplicable parts of the NSPS for Section E – Group #2 of the permit.

